

EXHIBIT 1

REQUIRED STATEMENT TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) Joelle Hernandez Case No. 19-04681 Chapter 13

All Cases: Moving Creditor PNC Bank, National Association Date Case Filed 02/22/2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 05/10/019

Chapter 7: ☐ No-Asset Report Filed on _____

☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral

a. ☒ Home 170 John St., New Lenox IL 60451

b. ☐ Car Year, Make, and Model _____

c. ☐ Other (describe) _____

2. Balance Owed as of 08/08/2019 \$ 120,559.74

Total of all other Liens against Collateral \$ 0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 126000.00

5. Default

a. ☐ Pre-Petition Default

Number of months _____ Amount \$ _____

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months 3 Amount \$ 3085.28

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months _____ Amount \$ _____

6. Other Allegations

a. ☒ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$ _____

iii. ☒ Rapidly depreciating asset

iv. ☐ Other (describe) _____

b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362(d)(1)

i. ☐ Bad Faith (describe) _____

ii. ☐ Multiple Filings

iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: August 15, 2019

/s/ Diana Carpintero

Counsel for Movant

	current date 8/7/2019	days past due -67
Total Suspense	\$49.27	
PP Pmt Suspense	\$47.91	
Debtor Suspense	\$1.36	
Post 1 Suspense	\$0.00	
Post 1 Suspense	\$0.00	
PPFN Suspense	\$0.00	
Trustee Suspense	\$0.00	

PCN's Filed POC	Effective Amount
	\$1.36